

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>J.G.,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	<b>CIVIL ACTION FILE</b>
<b>vs.</b>	:	
	:	<b>NO. 1:20-cv-05233-SEG</b>
<b>NORTHBROOK INDUSTRIES, INC., D/B/A UNITED INN AND SUITES,</b>	:	
	:	
<b>Defendant.</b>	:	<b>CONSENT MOTION</b>

**PLAINTIFF’S CONSENT MOTION FOR EXCESS PAGES FOR  
PLAINTIFF’S RESPONSE TO DEFENDANT’S RENEWED MOTION  
FOR JUDGMENT AS A MATTER OF LAW UNDER FEDERAL RULE  
OF CIVIL PROCEDURE 50 AS TO LIABILITY OR, ALTERNATIVELY,  
AS TO PUNITIVE DAMAGES**

Plaintiff hereby moves, with consent of Defendant, for excess pages for Plaintiff’s Response to Defendant’s Renewed Motion for Judgment as a Matter of Law Under Federal Rule of Civil Procedure 50 as to Liability or, Alternatively, as to Punitive Damages (Doc. 247). In this consent motion, Plaintiff requests that the Court grant Plaintiff five extra pages for Plaintiff’s response brief (for a total of 30 pages). In support, Plaintiff states the following:

1.

On August 27, 2025, Defendant filed a Renewed Motion for Judgment as a Matter of Law Under Federal Rule of Civil Procedure 50 as to Liability or, Alternatively, as to Punitive Damages. (Doc.247).

2.

The deadline for Plaintiff to file a response to the same motion is September 19, 2025. (Doc.253).

3.

Plaintiff requests an extra five pages (for a total of 30 pages) to respond to the several factual and legal issues raised by Defendant about the five-day trial in Defendant's Renewed Motion for Judgment.

4.

Defendant has consented to Plaintiff's request for an extra five pages for Plaintiff's Response to Defendant's Renewed Motion for Judgment.

5.

This is the first request Plaintiff has made for five extra pages for its response brief to Defendant's Renewed Motion for Judgment, and, therefore, Plaintiff respectfully requests that the Court grant the instant consent motion. The text of a proposed Consent Order is attached hereto as "Exhibit A."

**WHEREFORE**, Plaintiff respectfully requests that this Court grant the instant Consent Motion for the reasons set forth above.

Respectfully submitted this 19th day of September, 2025.

/s/ David H. Bouchard  
David H. Bouchard  
david@finchmccranie.com  
Georgia Bar No. 712859  
Oto U. Ekpo  
oto@finchmccranie.com  
Georgia Bar No. 327088

FINCH McCRANIE, LLP  
229 Peachtree Street, NE  
Suite 2500  
Atlanta, Georgia 30303  
(404) 658-9070 – Telephone  
(404) 688-0649 – Facsimile

*Attorneys for Plaintiff*

**CERTIFICATE OF COMPLIANCE**

This is to certify that the foregoing pleading has been prepared with a font and point selection approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14-point size.

Respectfully submitted,

/s/ David H. Bouchard

David H. Bouchard

david@finchmccranie.com

Georgia Bar No. 712859

FINCH McCRANIE, LLP  
229 Peachtree Street, NE  
Suite 2500  
Atlanta, Georgia 30303  
(404) 658-9070 – Telephone  
(404) 688-0649 – Facsimile

*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the foregoing filing into the District's ECF System, which will automatically forward a copy to counsel of record in this matter.

Respectfully submitted this 19th day of September, 2025.

/s/ David H. Bouchard

David H. Bouchard

david@finchmccranie.com

Georgia Bar No. 712859

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(404) 688-0649 – Facsimile